



# **Corrections and Clarifications Report**

## **January 2025**

The following Green Seal standards underwent non-substantive changes on January 31, 2025.

- GS-11, Edition 4.0, Paints, Coatings, Stains, and Sealers
- GS-33, Edition 5.3, Hotels and Lodging Properties
- GS-37, Edition 7.8, Cleaning Products for Industrial and Institutional Use
- GS-50, Edition 1.3, Standard for Personal Care and Cosmetic Products

## Introduction

Corrections and Clarifications Reports (CCRs) are Green Seal's public record of all non-substantive changes made to Green Seal standards. CCRs do not undergo a public comment process due to their low impact on the standards. Substantive changes, which may raise or lower the bar of health and environmental leadership, are required to undergo Green Seal's rigorous stakeholder engagement process, including a 30-day public comment period.

## Publication Schedule of CCRs

Corrections and Clarifications Reports are released on a quarterly basis on the last Friday of the month (currently, January, April, July, and October). These reports are available on Green Seal's website.<sup>1</sup>

## Edition Numbers of Standards

Although the text of a standard is clarified or corrected, the edition number of a standard (e.g., GS-8 Standard, Edition 5.5) remains the same after a Corrections and Clarifications Report.

## Our Stakeholder-Based Process

Although non-substantive changes are not published for public comment, Green Seal remains open to input from our stakeholders on all issues regarding the text of standards. We encourage any interested party or individual to submit feedback on Green Seal standards via Green Seal's website contact form, email, or phone.

## Clarifications

Green Seal periodically identifies problems with the text of a standard. In certain cases, a requirement may be worded in a way that leads to misinterpretations. In these cases, Green Seal clarifies the text of the standard via text deletions or text additions. The intent and reasoning behind clarifications is summarized in Corrections and Clarifications Reports.

## Corrections

Green Seal standards undergo scheduled quality reviews during which errors may be noted. Examples of errors include typos, grammatical errors, misplaced text, omissions in information, and inconsistencies within a standard. The background of the error and the explanation for the correction is summarized in Corrections and Clarifications Reports.

## Information about the Red-lined Text within CCRs

CCRs use formatting that is consistent with Green Seal's Standard Revision Proposals to depict the differences between the previous edition of a standard and the current edition.

- **Text Boxes** are used to highlight the excerpts of standard content.
- **Red font** is used to show that text has been added to a standard.
- Text with **strikethrough lines** show that text has deleted from a standard.

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<sup>1</sup> Green Seal Standards Documents Library, <http://www.greenseal.org/green-seal-standards/library>

## Table of Contents

|  |          |
|--|----------|
| <b>Standard for Paints, Coatings, Stains, and Sealers, GS-11</b>                     | <b>4</b> |
| 1. Editorial, Standard Title, Word Correction  | 4        |
| <b>Standard for Hotels and Lodging Properties, GS-33</b>                             | <b>5</b> |
| 1. Editorial, Entire Standard, Typeface and Spacing Consistency                      | 5        |
| <b>Standard for Cleaning Products for Industrial &amp; Institutional Use, GS-37</b>  | <b>6</b> |
| 1. Editorial, Section 2.1.7 Ingredients That Cause Asthma, Criteria Reference Update | 6        |
| 2. Correction, Annex D – Enzymes (Normative), Footnote Error                         | 6        |
| 3. Editorial, Annex E – Microorganisms (Normative), Misspelled Word                  | 7        |
| <b>Standard for Standard for Personal Care and Cosmetic Products, GS-50</b>          | <b>8</b> |
| 1. Editorial, Section 6.2.4.4, Relocating Criteria                                   | 8        |

## Standard for Paints, Coatings, Stains, and Sealers, GS-11

### 1. Editorial, Standard Title, Word Correction

In October 2024, Green Seal completed a branding update that included typeface, spacing, and header updates to all Standards. When completing the updates to GS-11 Standard for Paints, Coatings, Stains, and Sealers, the word “Sealants” was misused instead of “Sealers” in the Standard title on page 7. This has been updated to the correct word.

#### Updates to the Text

Green Seal Standard for Paints, Stains, Coatings, and ~~Sealants~~ **Sealers**, GS-11

#### Final Text

Green Seal Standard for Paints, Stains, Coatings, and Sealers, GS-11

## Standard for Hotels and Lodging Properties, GS-33

### 1. Editorial, Entire Standard, Typeface and Spacing Consistency

In October 2024, Green Seal completed a branding update that included typeface, spacing, and header updates to all Standards. When completing the updates to GS-33 Standard for Hotels and Lodging Properties, some text was not updated to the correct typeface. In addition, several table headers were not bolded, and some criteria were not correctly spaced throughout the document. The Standard was reviewed and updated to the correct typeface and spacing throughout. To see the final version of the standard, please visit Green Seal's website.<sup>2</sup>

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<sup>2</sup> <https://greenseal.org/standards/gs-33-hotels-and-lodging-properties/>

## Standard for Cleaning Products for Industrial & Institutional Use, GS-37

### 1. Editorial, Section 2.1.7 Ingredients That Cause Asthma, Criteria Reference Update

In August 2012, Green Seal added an Annex for Products Containing Enzymes to the GS-8 Standard for Cleaning Products for Household Use and the GS-37 Standard for Cleaning Products for Industrial and Institutional Use. In GS-37, Enzymes are under Annex D. When the Annexes were added to the Standards in 2012, the incorrect Annex was listed in Section 2.1.7. This has been updated from Annex C to Annex D.

#### Updates to Text

**2.1.7 Ingredients that Cause Asthma.** The *undiluted product* shall not contain any *ingredients* that have been identified as *asthmagens*. Refer to Annex ~~C~~ D, Requirement D for potential exemptions for *enzymes*.

#### Final Text

**2.1.7 Ingredients that Cause Asthma.** The *undiluted product* shall not contain any *ingredients* that have been identified as *asthmagens*. Refer to Annex D, Requirement D for potential exemptions for *enzymes*.

### 2. Correction, Annex D – Enzymes (Normative), Footnote Error

In April 2020, the GS-37 Standard for Cleaning Products for Industrial and Institutional Use was updated to Edition 7.5 from Edition 7.4. In Annex D - Enzymes (Normative), a footnote in Section D Exemptions referencing the EC and CAS numbers for titanium dioxide was mistyped as subscript and the footnote text was left out of the standard. The footnote has been re-included in the criteria text and the missing EC and CAS numbers for titanium dioxide have been re-added. The footnote numbers following footnote 10 have also been updated to reflect this addition.

#### Updates to Text

**D. Exemptions.** Enzymes are exempt from being categorized as asthmagens (2.1.7 herein) or respiratory sensitizers. Titanium dioxide<sub>40</sub><sup>10</sup> is exempt from the prohibition on carcinogens (2.1.3 herein) when it is present only due to the use of enzymes. For products sold in solid form, e.g., powders, bars, tablets, titanium dioxide must be bound within the product or enzyme matrix or bonded to other ingredients.

<sup>10</sup> Titanium Dioxide: EC Number 236-675-5, CAS Number 13463-67-7

#### Final Text

**D. Exemptions.** Enzymes are exempt from being categorized as asthmagens (2.1.7 herein) or respiratory sensitizers. Titanium dioxide<sup>10</sup> is exempt from the prohibition

on carcinogens (2.1.3 herein) when it is present only due to the use of enzymes. For products sold in solid form, e.g., powders, bars, tablets, titanium dioxide must be bound within the product or enzyme matrix or bonded to other ingredients.

<sup>10</sup> Titanium Dioxide: EC Number 236-675-5, CAS Number 13463-67-7

### 3. Editorial, Annex E – Microorganisms (Normative), Misspelled Word

In November 2021, Green Seal issued Edition 7.7 of GS-37 Standard for Cleaning Products for Industrial and Institutional Use, replacing Edition 7.6 from July 2020. One of the edits made was the addition of new criteria in Annex E – Microorganisms (Normative), and the expansion of criteria that was located under Section G Labeling Requirements. In Edition 7.7, this Section was expanded to cover Product Label and User Information (Section G) and Additional Requirements for Products in Spray Packaging (Section H). When the criteria were modified and expanded, a typo entered the last sentence of Section G; “the product should not be spray in to the air.” “Spray” has been updated to the correct “sprayed”.

#### Updates to Text

**G. Product Label and User Information.** The product label shall disclose that the product contains microorganisms. An alternative phrase for microorganisms may be approved by the certification program, e.g., “bacterial cultures.” The product label shall include a statement that the product will not function effectively when used in conjunction with disinfectants, such as chlorine bleach. For products that are sold for use in spray packaging,<sup>11</sup> the product label shall include a statement that the product should not be ~~spray~~ **sprayed** into the air.

#### Final Text

**G. Product Label and User Information.** The product label shall disclose that the product contains microorganisms. An alternative phrase for microorganisms may be approved by the certification program, e.g., “bacterial cultures.” The product label shall include a statement that the product will not function effectively when used in conjunction with disinfectants, such as chlorine bleach. For products that are sold for use in spray packaging,<sup>11</sup> the product label shall include a statement that the product should not be sprayed into the air.

## Standard for Standard for Personal Care and Cosmetic Products, GS-50

### 1. Editorial, Section 6.2.4.4, Relocating Criteria

In October 2024, Green Seal completed a branding update that included rearranging criteria and header updates to all Standards. When completing the reorganization, the criterion for Small Packages was mistakenly included under Subsection 6.2.4 Efficacy Labeling. This criterion was moved up to its own Section and the resulting criteria were renumbered.

#### Updates to Text

**6.2.3 Small Packages.** Packages containing less than one-eighth fluid ounce (or equivalent for other product forms) is exempt from labeling for each package the information included in the following provisions herein: 6.2.1 Ingredient Line; 6.2.2 Precautionary Statements. However, all of the information from these provisions shall be available to the consumer through other means (e.g., package, website).

**6.2.34 Disposal Labeling.** The label shall include proper disposal instructions including clear package recycling instructions, if applicable.

#### 6.2.-4-5 Efficacy Labeling

**6.2.-4-5.1 Antiperspirant Efficacy Labeling.** The product shall meet the requirements for a claim made on antiperspirant effectiveness (e.g., extra-effective, enhanced duration) according to the FDA Guidelines for Effectiveness Testing of OTC Antiperspirant Drug Products.

**6.2.-4-5.2 Insect Repellent.** The label for insect repellent products shall indicate the protection time as determined by the EPA OPPTS 810.3700 Insect Repellents for Human Skin and Outdoor Premise.

**6.2.-4-5.3 Sunscreen Efficacy Labeling.** The label for sunscreen products is permitted to claim “broad spectrum” since it meets appropriate performance requirements (6.1.3.2 herein).

~~**6.2.4.4 Small Packages.** Packages containing less than one-eighth fluid ounce (or equivalent for other product forms) is exempt from labeling for each package the information included in the following provisions herein: 6.2.1 Ingredient Line; 6.2.2 Precautionary Statements. However, all of the information from these provisions shall be available to the consumer through other means (e.g., package, website).~~

#### Final Text

**6.2.3 Small Packages.** Packages containing less than one-eighth fluid ounce (or equivalent for other product forms) is exempt from labeling for each package the information included in the following provisions herein: 6.2.1 Ingredient Line; 6.2.2

Precautionary Statements. However, all of the information from these provisions shall be available to the consumer through other means (e.g., package, website).

**6.2.4 Disposal Labeling.** The label shall include proper disposal instructions including clear package recycling instructions, if applicable.

### **6.2.5 Efficacy Labeling**

**6.2.5.1 Antiperspirant Efficacy Labeling.** The product shall meet the requirements for a claim made on antiperspirant effectiveness (e.g., extra-effective, enhanced duration) according to the FDA Guidelines for Effectiveness Testing of OTC Antiperspirant Drug Products.

**6.2.5.2 Insect Repellent.** The label for insect repellent products shall indicate the protection time as determined by the EPA OPPTS 810.3700 Insect Repellents for Human Skin and Outdoor Premise.

**6.2.5.3 Sunscreen Efficacy Labeling.** The label for sunscreen products is permitted to claim “broad spectrum” since it meets appropriate performance requirements (6.1.3.2 herein).